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15 Attorneys for Defendant
16 COLE HAAN

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 TAMMIE DAVIS, an individual, on behalf of
21 herself and all others similarly situated,

22 Plaintiff,

23 v.

24 COLE HAAN, INC., a New York
25 Corporation; and DOES 1 through 50,
26 inclusive,

27 Defendants.

28 STEFANI CONCEPCION, an individual, on
29 behalf of herself and all others similarly
30 situated,

31 Plaintiff,

32 v.

33 COLE HAAN, INC., a New York
34 Corporation; and DOES 1 through 50,
35 inclusive,

36 Defendants.

37 Case No. 11-cv-01826-JSW

38 **AMENDED JOINT STIPULATION AND
39 [PROPOSED] ORDER RE CONSOLIDATION
40 OF ACTION AND CONSOLIDATED
41 COMPLAINT**

42 Hon. Jeffrey S. White
43 Courtroom 11, 19th Floor

44 Case No. 11-cv-02187-JSW

45 COORDINATED CASE NO. 11-cv-02187-JSW

1 Plaintiffs Tammie Davis and Stefani Concepcion (“plaintiffs”) and defendant Cole
 2 Haan¹, by and through their respective counsel, jointly submit the following Amended
 3 Stipulation regarding consolidation of the above-referenced actions for all purposes and the filing
 4 of plaintiffs’ consolidated complaint on or before November 14, 2011.

5 **RECITALS**

6 **WHEREAS**, on June 29, 2011, Judge White issued an order coordinating the above-
 7 captioned related cases (*Concepcion v. Cole Haan Inc.*, Case No. 11-cv-02187-JSW, ECF No.
 8 19); and

9 **WHEREAS**, the parties agree that the above-referenced actions should be consolidated for
 10 all purposes because it will promote the interests of judicial economy and efficiency; and

11 **WHEREAS**, the parties agree that plaintiffs should file a consolidated complaint; and

12 **WHEREAS**, plaintiffs agree that Stonebarger Law, APC and Patterson Law Group, APC
 13 shall serve as co-lead plaintiffs’ counsel once the above-referenced actions are consolidated;

14 **STIPULATION**

15 **NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their
 16 respective counsel of record, that (1) the above-referenced actions shall be consolidated for all
 17 purposes, and (2) that plaintiffs shall file a consolidated complaint on or before November 14,
 18 2011. Plaintiffs further agree that Stonebarger Law, APC and Patterson Law Group, APC shall
 19 serve as co-lead plaintiffs’ counsel once the above-referenced actions are consolidated.

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¹ Cole Haan was erroneously sued as “Cole Haan, Inc.”

1 IT IS SO STIPULATED.

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3 Dated: November 4, 2011

4 COOLEY LLP
5 MICHELLE C. DOOLIN
6 BEATRIZ MEJIA
7 JENNIFER M. FRENCH
8 MATTHEW M. BROWN

9

10 /s/ Beatriz Mejia
11 Beatriz Mejia

12 Attorneys for Defendant
13 COLE HAAN

14

15 Dated: November 4, 2011

16 PATTERSON LAW GROUP, APC
17 JAMES R. PATTERSON

18 /s/ James R. Patterson
19 James R. Patterson

20 Attorneys for Plaintiff
21 TAMMIE DAVIS

22

23 Dated: November 4, 2011

24 STONEBARGER LAW, APC
25 GENE J. STONEBARGER
26 RICHARD D. LAMBERT

27 /s/ Gene J. Stonebarger
28 Gene J. Stonebarger

29 Attorneys for Plaintiff
30 STEFANI CONCEPCION

1 **FILER'S ATTESTATION**

2 Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that
3 all parties have concurred in the filing of this Amended Joint Stipulation and [Proposed] Order re
4 Consolidation of Action and Consolidated Complaint.

5 Dated: November 4, 2011

6 COOLEY LLP
7 MICHELLE C. DOOLIN
BEATRIZ MEJIA
JENNIFER M. FRENCH
MATTHEW M. BROWN

8 /s/ Matthew M. Brown
9 Matthew M. Brown

10 Attorneys for Defendant
11 COLE HAAN

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14 **IT IS SO ORDERED.**

15 November 7, 2011
16 Dated: _____

17 
18 The Honorable Jeffrey S. White
19 United States District Judge